

Jeff Barber  
Barber & Associates, LLC  
540 E 5<sup>th</sup> Ave.  
Anchorage, AK 99501  
ph: 907 276-5858  
fax: 907 276-5817  
Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA

SETH HANSEN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
UNITED STATES,	)	
	)	
Defendant.	)	
_____	)	Case No.

**COMPLAINT**

COMES NOW the plaintiff, SETH HANSON, by and through his attorneys,  
Barber & Associates, LLC, and for his complaint against the UNITED STATES, does  
state and allege as follows:

1. That at all times material hereto, plaintiff was and is a resident of Palmer,  
Alaska.
2. That this action is brought pursuant to Federal Tort Claims Act, 28 U.S.C.  
§§ 1346(b) and 2671-2680 for the claims set forth below to the U.S. Army.
3. Six months having elapsed, all conditions precedent to a Federal Tort

Claims Act have been met.

4. The United State of America is the appropriate defendant under the Federal Tort Claims Act.

5. The U.S. Army used Fort Wainwright, Alaska for military operations since 1938.

6. For decades, the U.S. Army negligently stored, buried, and released toxic chemicals and materials into the environment at Fort Wainwright, Alaska.

7. The U.S. Army negligently failed to identify, clean and remedy areas affected by toxic chemicals and materials at Fort Wainwright, Alaska.

8. The U.S. Army negligently failed to disclose and warn others about toxic chemicals and materials at Fort Wainwright, Alaska.

9. On or about June 15, 2005, Seth Hansen was exposed to toxins on the job site at a project known as Taku Gardens at Fort Wainwright, Alaska which was a substantial factor in causing harm for which the defendant is liable.

10. In May, 2014, Seth Hansen was diagnosed with papillary thyroid carcinoma at age 29.

11. The defendant's negligent conduct as described above in paragraphs 6, 7, and 8 was a substantial factor in causing Seth Hansen's cancer.

12. The defendant is liable to the plaintiff for past and future medical expenses, pain, suffering, loss of capacity for enjoyment of life, loss of earnings, diminished earning

capacity, loss of non-market household services, physical impairment, inconvenience, and other pecuniary and non-pecuniary damages to be more fully set forth at trial, all in an amount greater than \$100,000.00 (ONE HUNDRED THOUSAND DOLLARS), the exact amount to be set by the trier of fact.

WHEREFORE, having fully pled plaintiff's complaint, plaintiff requests a judgment against the United States of America for an amount greater than \$100,000.00 (ONE HUNDRED THOUSAND DOLLARS) to be established by the trier of fact, plus interest, costs and attorney fees and such other relief as the court deems just.

DATED at Anchorage, Alaska this 24<sup>th</sup> day of April, 2018.

BARBER & ASSOCIATES, LLC  
Attorneys for Plaintiff

By: 

JEFF BARBER

540 E 5<sup>th</sup> Ave.

Anchorage, AK 99501

Phone: (907) 276-5858

Fax: (907) 276-5817

Email: [jbarber@alaskainjury.com](mailto:jbarber@alaskainjury.com)

ABA No. 0111058